

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RYANNE MCNEESE, §
§
Plaintiff, §
§
v. § Civ. A. No.: 16-2810
§
LONE STAR COLLEGE SYSTEM, §
§
Defendant. §

**JOINT MOTION TO EXTEND PRETRIAL DEADLINES, AND TO
CONTINUE DOCKET CALL AND TRIAL DATE**

Plaintiff Ryanne McNeese and Defendant Lone Star College System file this Joint Motion to Extend Trial Deadlines and Continue the Docket Call and Trial Date.

NATURE AND STAGE OF THE PROCEEDING

Plaintiff filed this lawsuit on August 15, 2016 in state court alleging that Defendant retaliated against her for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964. Defendant removed this case on September 16, 2016. Defendant filed its Motion for Summary Judgment on November 30, 2017. (Dkt No. 13) Plaintiff filed a response on December 7, 2017. (Dkt No. 14) Defendant filed a reply on December 14, 2017. (Dkt. No. 15) Summary Judgment was denied on May 31, 2018. (Dkt. No. 27) Docket call is set for June 15, 2018. Trial is set for June 18, 2018.

CONTINUANCE AND EXTENSION REQUESTED

Plaintiff and Defendant respectfully request that the Court extend all pretrial deadlines, and respectfully request that the Court continue the docket call and trial setting. Plaintiff and Defendant

have agreed to seek to resolve this matter and wish to mediate. This extension is not sought to unduly delay this case but rather so that justice may be served.

For these reasons, Plaintiff and Defendant respectfully request that this Motion be granted, and that the Court extend pre-trial deadlines and continue that docket call and trial setting until August 2018.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

/s/ Stephen J. Quezada
Carolyn Russell
Texas SBN: 24003913
Ogletree, Deakins, Nash,
Smoak & Stewart, P.C.
One Allen Center
500 Dallas St., Ste. 3000
Houston, Texas 77002
713-655-0855 (Phone)
713-655-0020 (Fax)
carolyn.russell@ogletreedeakins.com

**ATTORNEY-IN-CHARGE FOR
DEFENDANT LONE STAR COLLEGE
SYSTEM**

OF COUNSEL:

Stephen J. Quezada
Texas SBN: 24076195
Ogletree, Deakins, Nash,
Smoak & Stewart, P.C.
One Allen Center
500 Dallas St., Ste. 3000
Houston, Texas 77002
713-655-0855 (Phone)
713-655-0020 (Fax)
stephen.quezada@ogletreedeakins.com

/s/ Peter Costea

Peter Costea
4544 Post Oak Place, Suite 350
Houston, Texas 77027
713-337-4304 (Phone)
713-237-0401 (Fax)
peter@costealaw.com

ATTORNEY FOR PLAINTIFF
RYANNE MCNEESE

CERTIFICATE OF SERVICE

This is to certify that on June 12, 2018, a true and correct copy of the foregoing document has been served on all counsel of record via the Electronic Case Filing system.

Peter Costea
4544 Post Oak Place, Suite 350
Houston, Texas 77027
713-337-4304 (Phone)
713-237-0401 (Fax)
peter@costealaw.com

ATTORNEY FOR PLAINTIFF
RYANNE MCNEESE

/s/ Stephen J. Quezada

Stephen J. Quezada